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Attorneys for Defendants,  
**FRANK FERRARA; CHARLIE FERRARA**

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DISTRICT**

CORY SPENCER, an individual; DIANA  
MILENA REED, an individual;  
COASTAL PROTECTION RANGERS,  
INC. et al.

**Plaintiff,**

vs.

LUNADA BAY BOYS; THE INDIVIDUAL MEMBERS OF THE LUNADA BAY BOYS, including but not limited to SANG LEE, BRANT BLAKEMAN, ANGELO FERRARA, FRANK FERRARA, CHARLIE FERRARA, et al.

### Defendants.

Case No. 2:16-cv-2129

Judge: Hon. S. James Ontero  
Dept: 1

**RULE 26(A) INITIAL  
DISCLOSURES BY DEFENDANTS  
FRANK FERRARA AND  
CHARLIE FERRARA**

Pursuant to Federal Rule of Civil Procedure 26(a)(1), Defendants, FRANK FERRARA and CHARLIE FERRARA (“Defendants”) submit the following initial disclosures:

1. **Witnesses.** The name and, if known, the address and telephone number of each individual likely to have discoverable information, along with the subjects of that information, that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

1 Defendants have denied the factual allegations in the Complaint. Based on  
 2 present information reasonably available, Defendants initially disclose:

<u>Name of Individual</u>	<u>Contact Information</u>	<u>Subject Matter</u>
Frank Ferrara	Contacted through counsel	Factual allegations
Charlie Ferrara	Contracted through counsel	Factual allegations

7       2. **Documents.** A copy, or a description by category and location, of all  
 8 documents, electronically stored information, and tangible things that the disclosing  
 9 party has in its possession, custody, or control and may use to support its claims or  
 10 defenses, unless the use would be solely for impeachment.

11      Defendants have denied the factual allegations in the Complaint. Based on  
 12 present information reasonably available, Defendants initially disclose:

<u>Category</u>	<u>Location</u>
No documents at this time.	

16 Pursuant to Rule 26(e), Defendants will supplement this disclosure as  
 17 necessary.

19 Dated: November 29, 2016

BREMER WHYTE BROWN & O'MEARA  
 20 LLP

21 By:

22   
 23 Patrick Au, Esq.  
 24 Laura L. Bell, Esq.  
 25 Attorneys for Defendants,  
 26 FRANK FERRARA; CHARLIE  
 27 FERRARA

## **PROOF OF SERVICE**

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 21271 Burbank Boulevard, Suite 110, Woodland Hills, California 91367.

On November 29, 2016, I served the within document(s) described as: **DEFENDANT, FRANK FERRARA AND CHARLIE FERRERA'S RULE 26(A) INITIAL DISCLOSURES BY DEFENDANTS FRANK FERRARA AND CHARLIE FERRARA** on the interested parties in this action as stated on the attached mailing list.

- (BY MAIL) By placing a true copy of the foregoing document(s) in a sealed envelope addressed as set forth on the attached mailing list. I placed each such envelope for collection and mailing following ordinary business practices. I am readily familiar with this Firm's practice for collection and processing of correspondence for mailing. Under that practice, the correspondence would be deposited with the United States Postal Service on that same day, with postage thereon fully prepaid at Woodland Hills, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

(BY ELECTRONIC MAIL SERVICE) Based on OCSC Local Rule 352 and CRC Rule 2.251(c)(2) or an agreement of the parties to accept electronic service, I caused the document(s) to be sent to the person(s) at the electronic service address indicated on the attached mailing list.

Executed on November 29, 2016, at Woodland Hills, California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Shawn Reutter  
(Type or print name)

Shawn Reutter  
(Signature)

Cory Spencer v. Lunada Bay Boys et al.,

Case No. 2:16-cv-2129-SJO

**BWB&O CLIENT: Frank and Charlie Ferrara**  
**BWB&O FILE NO.: 1178.176**

SERVICE LIST

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	<p>Samantha Wolff, Esq.  <b>HANSON BRIDGETT</b>          425 Market Street          26th Floor          San Francisco, CA 94105          (415) 777-3200          (415) 541-9366 Fax          Attorneys For <b>PLAINTIFF</b></p> <p><a href="mailto:swolff@hansonbridgett.com">swolff@hansonbridgett.com</a></p> <p>Jacob Song, Esq.  <b>KUTAK ROCK LLP</b>          5 Park Plaza          Suite 1500          Irvine, CA 92614          (949) 417-0999          (949) 417-5639          Attorney For <b>CITY OF PALOS VERDES ESTATES</b> and <b>JEFF KEPLEY</b>, in his representative capacity, serves as the Chief of Police Department of Defendant <b>City of Palos Verdes Estates</b>.</p> <p><a href="mailto:jacob.song@kutakrock.com">jacob.song@kutakrock.com</a></p> <p>Mark Fields, Esq.  <b>LAW OFFICES OF MARK C. FIELDS</b>          333 So. Hope Street          Suite 3500          Los Angeles, CA 90071          (213) 617-5225          (213) 629-2420 Fax          Attorney For <b>ANGELO FERRARA</b>          an individual member of <b>LUNADA BAY BOYS</b> and <b>N.F.</b> an individual member of <b>LUNADA BAY BOYS</b></p> <p><a href="mailto:fields:markfieldslaw.com">fields:markfieldslaw.com</a></p>	<p>Tyson M. Shower, Esq.  <b>HANSON BRIDGETT</b>          500 Capitol Mall          Suite 1500          Sacramento, CA 95814          (916) 442-3333          (916) 442-2348 Fax          Attorneys For <b>PLAINTIFFS</b></p> <p><a href="mailto:tshower@hansonbridgett.com">tshower@hansonbridgett.com</a></p> <p>J. Patrick Carey, Esq.  <b>LAW OFFICE OF PATRICK CAREY</b>          1230 Rosecrans Avenue          Suite 300          Manhattan Beach, CA 90266          (310) 526-2237          (310) 526-2237 Fax          Attorney For <b>ALAN JOHNSTON</b> individual membeer of <b>LUNADA BAY BOYS</b> aka <b>JALIAN JOHNSTON</b></p> <p>Peter R. Haven, Esq.  <b>HAVEN LAW</b>          1230 Rosecrans Avenue          Suite 300          Manhattan Beach, CA 90266          (310) 272-5353          (213) 477-2137 Fax          Attorneys For <b>MICHAEL RAY PAPAYANS</b></p> <p><a href="mailto:peter@havenlaw.com">peter@havenlaw.com</a></p>	<p>Victor Otten, Esq.  <b>OTTEN LAW, PC</b>          3620 Pacific Coast Highway          Suite 100          Torrance, CA 90505          (310) 378-8533          (310) 347-4225 Fax          Attorneys For <b>PLAINTIFFS</b></p> <p><a href="mailto:vic@ottenlawpc.com">vic@ottenlawpc.com</a></p> <p>Aaron G. Miller, Esq.  <b>THE PHILIPS FIRM</b>          800 Wilshire Boulevard          Suite 1550          Los Angeles, CA 90017          (213) 244-9913          (213) 244-9915 Fax          Attorneys For <b>ANGELO FERRARA</b></p> <p><a href="mailto:amiller@thephillipsfirm.com">amiller@thephillipsfirm.com</a></p> <p>Dana Alden Fox, Esq.  <b>LEWIS BRISBOIS BISGAARD &amp; SMITH, LLP</b>          633 W. 5<sup>th</sup> Street          Site 4000          Los Angeles, CA 90071          (213) 580-3858          (213) 250-7900 Fax          Attorneys For <b>SANG LEE</b></p> <p><a href="mailto:Dana.Fox@lewisbrisbois.com">Dana.Fox@lewisbrisbois.com</a></p>
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1	Robert S. Cooper, Esq. <b>BUCHALTER NEMER, APC</b> 1000 Wilshire Boulevard Suite 1500 Los Angeles, CA 90017 (213) 891-5230 (213) 896-0400 Fax Attorneys for <b>BRANT BLAKEMAN</b>  rcooper@buchalter.com	Peter Crossin, Esq. <b>VEATCH CARLSON, LLP.</b> 1055 Wilshire Boulevard 11th Floor Los Angeles, CA 90017 (213) 381-2681 (213) 383-6370 Attorneys for <b>BRANT BLAKEMAN</b>  pcrossin@veatchfirm.com	Daniel M. Crowley, Esq. <b>BOOTH MITCHELL &amp; STRANGE, LLP</b> 707 Wilshire Boulevard Suite 4450 Los Angeles, CA 90017 (213) 738-0100 (213) 380-3308 Fax Attorneys for <b>SANG LEE</b>  dmcrowley@boothmitchel.com
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